

~~SECRET~~

Unsealed  
on 8/4/08  
(18)

FILED  
2008 MAR 27 AM 11:28

KMH

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXSANDR SUVOROV,

aka Lifestyle,

aka JonnyHell,

aka Dantist,

Defendant.

Criminal Case No.

08 CR 0955 H

I N D I C T M E N T

Title 18, U.S.C.,  
Secs. 1029(b)(2) - Conspiracy to  
Possess Unauthorized Access  
Devices and to Traffic  
Unauthorized Access Devices;  
Title 18, U.S.C., Secs. 1029(a)(3)  
and (c)(1)(A)(i) - Possession of  
Unauthorized Access Devices;  
Title 18, U.S.C., Secs. 1029(a)(2)  
and (c)(1)(A)(i) - Trafficking in  
Unauthorized Access Devices;  
Title 18, U.S.C., Secs. 1028(a)(7)  
and (b)(1)(D) - Identity Theft;  
Title 18, U.S.C.,  
Sec. 1028A(a)(1) - Aggravated  
Identity Theft; Title 18, U.S.C.,  
Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

Conspiracy to Traffic in Unauthorized Access Devices

1. Beginning on a date unknown and continuing up to and including March 26, 2008, within the Southern District of California, and elsewhere, defendant ALEXSANDR SUVOROV, aka Lifestyle, aka JonnyHell, aka Dantist, and Maksym Yastremskiy, aka Maksik, charged elsewhere, with the intent to defraud, did knowingly and

OBG:nlv:San Diego  
3/26/08

lvet

1 intentionally conspire together with each other and with other persons  
2 known and unknown to the grand jury, to:

- 3 a. knowingly and with the intent to defraud, posses  
4 fifteen or more unauthorized access devices; in  
5 violation of Title 18, United States Code,  
6 Section 1029(a)(3); and,  
7 b. knowingly and with intent to defraud, traffic in one  
8 or more unauthorized access devices, that had been  
9 stolen or obtained with the intent to defraud, and by  
10 such conduct affected interstate commerce and obtained  
11 anything of value aggregating \$1,000.00 or more during  
12 that period, representing the proceeds from the sales  
13 of stolen credit card account numbers; in violation of  
14 Title 18, United States Code, Sections 1029(a)(2) and  
15 (c)(1)(A)(i).

16 **OVERT ACTS**

17 2. In furtherance of said conspiracy, and to effect the objects  
18 thereof, the following overt acts, among others, were committed within  
19 the Southern District of California, and elsewhere:

- 20 a. On or about February 10, 2006, Maksym Yastremskiy,  
21 aka Maksik, charged elsewhere, agreed to sell 160,000  
22 unauthorized credit card account numbers to a  
23 purchaser located in San Diego, California;  
24 b. On or about February 20, 2006, defendant ALEXSANDR  
25 SUVOROV, aka Lifestyle, aka JonnyHell, aka Dantist,  
26 provided Maksym Yastremskiy, aka Maksik, with 160,000  
27 unauthorized credit card account numbers for the  
28 purpose of re-sale.

1 c. On or about March 17, 2006, pursuant to the  
2 aforementioned February 10, 2006 negotiations and in  
3 exchange for \$10,000.00 in U.S. currency, Maksym  
4 Yastremskiy, aka Maksik, transferred, via an e-mail  
5 message, 6,798 of the negotiated 160,000 unauthorized  
6 credit card account numbers.

7 All in violation of Title 18, United States Code, Section 1029(b)(2).

8 Count 2

9 Possession of Unauthorized Access Devices

10 3. On or about February 20, 2006, within the Southern District  
11 of California, and elsewhere, defendant ALEXSANDR SUVOROV,  
12 aka Lifestyle, aka JonnyHell, aka Dantist, did knowingly and with  
13 intent to defraud, possessed approximately 160,000 unauthorized access  
14 devices; in violation of Title 18, United States Code,  
15 Sections 1029(a)(3) and (c)(1)(A)(i), and Title 18, United States  
16 Section 2.

17 Count 3

18 Trafficking in Unauthorized Access Devices

19 4. Beginning on May 2, 2005, and continuing up to and including  
20 on or about May 1, 2006, within the Southern District of California,  
21 and elsewhere, defendant ALEXSANDR SUVOROV, aka Lifestyle,  
22 aka JonnyHell, aka Dantist, did knowingly and with intent to defraud,  
23 traffic in one or more unauthorized access devices, to wit,  
24 approximately 160,000 credit card account numbers that had been stolen  
25 or obtained with intent to defraud, and by such conduct affected  
26 interstate commerce and obtained anything of value aggregating  
27 \$1,000.00 or more during that period, to wit, approximately \$75,000.00  
28 in cash, representing the proceeds from the sales of stolen credit

1 card account numbers; in violation of Title 18, United States Code,  
2 Sections 1029(a)(2) and (c)(1)(A)(i), and Title 18, United States  
3 Section 2.

4 Count 4

5 Identity Theft

6 5. Beginning on May 2, 2005, and continuing up to and including  
7 on or about May 1, 2006, within the Southern District of California,  
8 and elsewhere, defendant ALEXSANDR SUVOROV, aka Lifestyle,  
9 aka JonnyHell, aka Dantist, did knowingly transfer, in and affecting  
10 interstate or foreign commerce, without lawful authority, means of  
11 identifications of other persons, to wit, credit card account numbers,  
12 with the intent to commit, to aid or abet, and in connection with a  
13 violation of Title 18, United States Code, Section 1029(a)(2), and as  
14 a result of the offense, the defendant obtained anything of value  
15 aggregating \$1,000.00 or more; in violation of Title 18, United States  
16 Code, Sections 1028(a)(7) and (b)(1)(D), and Title 18, United States  
17 Section 2.

18 Counts 5-15

19 Aggravated Identity Theft


20 6. On or about the dates set forth below, within the Southern  
21 District of California, defendant ALEXSANDR SUVOROV, aka Lifestyle,  
22 aka JonnyHell, aka Dantist, during and in relation to a felony  
23 violations of Title 18, United States Code, Section 1029(a)(2) and  
24 Title 18, United States Code, Section 1029(a)(3), knowingly  
25 transferred, without lawful authority, a means of identification of  
26 another person, to wit, the credit card account numbers as set forth  
27 below:  
28

COUNT	TRANSFER DATE	ACCOUNT NUMBER
5	04-25-06	XXXX-XXXX-XXXX-5307
6	04-25-06	XXXX-XXXX-XXXX-3618
7	04-25-06	XXXX-XXXX-XXXX-7862
8	04-25-06	XXXX-XXXX-XXXX-2277
9	04-18-06	XXXX-XXXX-XXXX-4182
10	04-18-06	XXXX-XXXX-XXXX-5567
11	04-18-06	XXXX-XXXX-XXXX-7325
12	04-18-06	XXXX-XXXX-XXXX-1738
13	03-17-06	XXXX-XXXX-XXXX-5986
14	03-17-06	XXXX-XXXX-XXXX-2559
15	03-17-06	XXXX-XXXX-XXXX-6887

All in violation of Title 18, United States Code, Section 1028A(a)(1),  
and Title 18, United States Section 2.


DATED: March 27, 2008.

A TRUE BILL:

  
Foreperson

KAREN P. HEWITT  
United States Attorney

By:

  
ORLANDO B. GUTIERREZ  
Assistant U. S. Attorney